

CRONA FUND RAIF V.C.I.C PLC

Privacy Policy

Latest Update: July 2024

The Privacy Policy of the Website of the Crona Fund RAIF V.C.I.C. PLC (hereinafter “the Crona Fund”, “RAIF”) explains how Eleon Capital Management Ltd (hereinafter “ECM”, “we”, “us”, and “our”), as the administrator of the Website and Alternative Investment Fund Manager of the Crona Fund, collects, uses, shares and protects your data and personal information that are being obtained through the Crona Fund’s Website. It is necessary to read all the provisions of the Privacy Policy since with this website you share with us your personal data including your geo-location. We know that you take your privacy seriously. We do, too. We seek to be transparent about our data practices and give you control over the information we collect about you. This Privacy Policy also describes applicable data protection rights including a right to object to some of our processing.

1. General Information

1.1. This Privacy Policy explains how Eleon Capital Management Ltd, incorporated in Cyprus with registration number HE 426641, and with registered address of 1 Arch. Makarios III Avenue, Office 801, Lakatamia, 2324 Nicosia, Cyprus, in its capacity as administrator of the Website and Alternative Investment Fund Manager of the Crona Fund RAIF V.C.I.C. PLC, incorporated in Cyprus with registration number HE 455434, and with registered address of 74 Amathountos, Agios Tychonas, 4532, Limassol, Cyprus, collects, uses, shares, and protects User information obtained through the Website. When we ask for certain personal information from Users, it is because we are required for the provision of our services and/or it may be required for the purposes of compliance with applicable law, for example, the Alternative Investment Funds Law 124(I)/2018 and the Alternative Investment Fund Manager Law 157(I)/2021), as those may be amended or substituted from time to time.

1.2. Any non-required information you provide to us is done so voluntarily. You decide whether to provide us with this non-required information. Note that some information is not required but necessary for you to unravel all the information or services relating to the Crona Fund.

1.3. By accepting the Privacy Policy notification, you consent to the data practices described in this Privacy Policy, as well as when you register for an account, transact with us, send an enquiry and/or visit the Website and/or downloading and opening the Website’s material.

1.4. On occasion, we may revise this Privacy Policy to reflect changes in law or our personal data collection and use practices. If material changes are made to this Privacy Policy, the changes will be announced by personal notification to your account. We will ask for your consent before using your information for any purpose that is not covered in this Privacy Policy.

1.5. This Privacy Policy was made on the basis the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC (General Data Protection Regulation), hereinafter also referred to as “GDPR”.

2. Definitions and legal references

2.1. Data subject: The person who uses this Website and which, unless otherwise specified, coincides with the underlying Personal Data.

2.2. Data processor: The individual or legal person, public authority, organization or other entity processing personal data on behalf of the controller as described in this privacy policy.

2.3. Data controller: An individual or legal person, a public authority, an organization or other entity which, either alone or together with others, determines the purposes and means of processing the Personal Data, including security measures relating to its operation and use. The Data Controller for personal data obtained through the Website is ECM.

2.4. European Union (or EU): Unless otherwise stated, all references made in this document to the European Union include all the current Member States in the European Union and the European Economic Area.

2.5. Geo-location: The identification of the geographic location of a User or computing device via a variety of data collection mechanisms such as Bluetooth, WIFI connection or GPS. Typically, most geolocation services use network routing addresses or internal GPS devices to determine this location.

2.6. Legal information: This privacy statement has been prepared on the basis of provisions of Regulation (EU) 2016/679 (General Data Protection Regulation). This privacy policy is strictly related to this site.

2.7. Personal data (or data): Personal data is any information that relates to an identified or identifiable living individual. Different pieces of information, which are collected together can lead to the identification of a particular person, also constitute personal data.

2.8. Service: Any service provided by the Crona Fund or ECM through its Website, for example, the provision of information pertaining to the Crona Fund or any materials related thereto which may be provided to qualified persons.

2.9. User: Refers to a user of the Website.

2.10. Usage data: Information collected automatically through this Website (or third party services used on this Website), which may include: the IP addresses or domain names of the computers used by the Users using this Website, the URIs (Uniform Resource Identifier), at the time of the request, the method used to submit the request to the server, the size of the file received in response, the numeric code

indicating the status of the server response (successful outcome, error, etc.), the source country, the browser and operating system functions used by the User, the various time-per-visit details (e.g., time spent on each page of the Website), and details of the route followed in the Website with special reference to the sequence, the pages you have visited, and other measures relating to the operating system of the device and/or the User& IT environment.

2.11. Website:www.cronafund.com through which the user & Personal Data is collected and processed.

3. Administrator of Personal Data

3.1. The Personal Data of the users are under the authority of ECM. If you have any questions, requests or complaints regarding the processing of your personal data by us, you can also contact ECM using the following dedicated email address at fundservices@eleoncapital.com .

3.2. Questions, applications and complaints referred to in the preceding paragraphs should, in particular include:

- 3.2.1 data relating to the person or persons concerned by the inquiry or request,
- 3.2.2 the event which is the reason for sending a message to us,
- 3.2.3 requests and legal grounds for demanding request,
- 3.2.4 the expected manner of handling the matter.

4. What Data Does ECM Collect

4.1. Data You Provide to us:

- 4.1.1. We collect data that you provide to us when you create an account, such as full name, email address, your professional title and occupation, financial information, phone number, birthday, gender, the city in which you live, username, and other data if you create an account using third party log-in credentials.
- 4.1.2. We may also collect other data you provide when you use the Services, including Geo-location of your device.

4.2. We also collect additional data about you when you use the Services. For example:

- 4.2.1. data about how you interact with the Services, such as your search words, page views, date and time of interactions, time spent on each page;
- 4.2.2. device information, such as your operating system, IP address, browser type and language; and

4.2.3. data from cookies, pixels and other technologies, such as cookie ID, advertising ID or other unique advertising ID, web beacons, and local storage. You can control certain types of cookies through your browser settings or other tools.

4.3. Data Received from Third Parties. We may receive data about you from third parties, including:

4.3.1. our Affiliates (e.g. business customers of our Services, or brokers);

4.3.2. third parties that provide services to us, such as credit reference agencies, public databases, registers and records and information obtained from sanction checking and background screening, offered by our business partners, including those from whom we license data; and

4.3.3. The information we obtain from third parties includes demographic data, data about how you interact with the third party & websites and apps, device data (including mobile device and advertising identifiers, such as Apple IDFA or Google Advertising ID), and information from cookies, pixels and other similar technologies. We may also collect information such as your credit card's details and billing address.

5. How Is My Data Used by ECM?

5.1. To Operate, Maintain and Improve the Services

5.1.1. We use your data to operate, maintain the Services, and our business, and to provide you with our Services in a more personalized manner, including complying with our reporting and obligations to regulatory and supervisory authorities.

5.1.2. We use various technologies to determine your precise location, such as the location services of your operating system or browser, sensor data from your device (e.g. magnetometer, barometer, gyroscopes, accelerometers, compasses, Bluetooth data, beacon data, Wi-Fi access points, GPS data, and cell tower data), and other data that may help us understand your precise location.

5.2. Communicate with You

We use your data to communicate with you by email, text (if you opt-in), or in our Website, about material changes or updates to our Services, or anything else we think may be of interest to you.

5.3. Protection of Our Rights

We may use your data to protect the rights, property or safety of the Crona Fund or ECM, the Services, our respective Users and employees, or any third party. For example, we may use your data to protect against identity theft, prevent fraud or other criminal activity, claims or other liabilities. We may also use your data to comply with and enforce applicable legal requirements, relevant industry standards and our policies, including this Privacy Policy and our [Terms and Conditions](#).

6. When Is My Data Shared?

We may share your data as described in this Privacy Policy or when you have given us consent to do so.

6.1. Data That May Be Shared with Affiliates, Service Providers and Partners

We may share your data with our affiliated entities, and service providers that perform services on our behalf, such as management, administration and IT services. These service providers may be located in countries other than the country in which the information originally was collected. We do not authorize our service providers to retain, use or disclose the data except as necessary to perform services on our behalf or comply with legal requirements.

6.2. Compliance with Law, Protection of Rights and Corporate Events

6.2.1. We may share data if required by law or if a legal issue arises between us and you and we need to protect your or our rights.

6.2.2. We may also share data as part or in anticipation of a business sale, merger, consolidation, investment, change in control, transfer of substantial corporate assets, reorganization, liquidation, or similar business transaction or corporate event.

6.3. Third-Party Analytics

On our Consumer Services, we use third-party analytics services, such as those of Google Analytics. The service providers that administer these analytics services use cookies and other automated technologies to collect data (such as IP addresses and other device identifiers) to evaluate, for example, use of our Services and to diagnose technical issues. To learn more about Google Analytics, please visit <https://www.google.com/policies/privacy/partners/>.

7. How do I Access or Delete My Data?

7.1. You may access and update your data at any time through the “Settings” tab in your account.

7.2. You may also delete your data and account at any time by contacting us through the Website. If you delete your data, your profile, including your history, addresses and other account data will be removed, and you will no longer be able to access such data. We will not be able to restore your account once it has been deleted. Deletion of your account may not be immediate. Residual copies of your personal information or posts may remain on backup media for a short period of time thereafter.

7.3. We may also retain data as required by applicable law and we may retain data that has been anonymized or otherwise does not constitute or contain personal information.

7.4. If you have questions about accessing, updating, or deleting your data, please contact us at fundservices@eleoncapital.com.

8. Unsubscribe from Marketing Emails

By Email: You can opt out of marketing or promotional emails at any time by adjusting your preferences through the “Settings” tab in your account. You may also unsubscribe from marketing emails by following the instructions in the email or by contacting us. Please note that you cannot opt out of legal notices.

9. Personal Information Retention

To the extent required by applicable law, we keep the personal information you provide for the duration of our relationship, plus a reasonable period thereafter to comply with the applicable statute of limitations and other applicable laws.

10. How We Protect Personal Information

We maintain administrative, technical and physical safeguards designed to protect personal information we obtain through the Services against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

11. More Information for Users From the EEA, UK and Switzerland

11.1. Where GDPR applies to the processing of your Personal Data, we rely on several legal bases. These include:

- 11.1.1. When the processing is necessary to perform our contract with you, for example when you are an investor in the Crona Fund, such as our Terms and Conditions.
- 11.1.2. When the processing is necessary for our legitimate business interests, including but not limited to, improving our Services;
- 11.1.3. When you have given us your consent, including as described in this Privacy Policy. You may withdraw your consent to the processing at any time using the settings on your device or in your account;
- 11.1.4. When we have a legal obligation to do so, as described in this Privacy Policy.

11.2. Subject to applicable law, you may have a number of rights regarding the processing of your Personal Data, including:

- 11.2.1. the right to request access to or copies of, your personal data that we process or control, together with information regarding the nature, processing and disclosure of that personal data;

11.2.2. the right to request rectification of any inaccuracies in your Personal Data that we process or control;

11.2.3. the right to request:

11.2.4. deletion of your personal data that we process or control; or

11.2.5. restriction of processing of your personal data that we process or control;

11.2.6. the right to object, to the processing of your personal data by us or on our behalf;

11.2.7. the right to have your personal data that we process or control transferred to another data controller, to the extent applicable;

11.2.8. the right to withdraw where we process your personal data on the basis of your consent, and

11.2.9. the right to file a complaint with a Data Protection Authority regarding the processing of your personal data by us or on our behalf.

11.3. To exercise one or more of these rights, or to ask a question about these rights or any other provision of this Privacy Policy, or about our processing of your personal data, please use the contact details provided in the "[Contact Us](#)" section or email us at fundservices@eleoncapital.com.

11.4. These rights may be limited in certain circumstances, for example, if fulfilling your request would (i) reveal personal data about another person, (ii) infringe the rights of a third party (including our rights), (iii) cause us to delete information that we are required by law to keep or have compelling legitimate interests in keeping. Relevant exemptions are included in both the GDPR and in local implementing legislation. We will inform you of relevant exemptions we rely upon when responding to any request you make.

12. Language of the Privacy Policy

12.1 The original and legally binding text of this Privacy Policy is in the English Language. All translations of this Privacy Policy into other languages are provided solely for convenience and reference purposes.

12.2 Any interpretation, understanding, or implementation of the Privacy Policy shall be based on the English version. In the event of any confusion, discrepancy, or inconsistency between the English version and any translated version, whether the translation has been accessed on the Website or otherwise, the English version shall be considered the authoritative and legally binding text.

12.3 Translations of this Privacy Policy may not accurately reflect the precise legal meaning, intent, or interpretation of the English version. Neither the Crona Fund nor ECM warrant the accuracy, completeness, or reliability of any translation, and shall not be liable for any losses, damages, or misunderstandings resulting from reliance on translated versions, including those provided on the Website.

13.4 In the event of any changes to this Privacy Policy, the English version shall prevail over any translated versions, and the revised English version shall become the new legally binding text.

14. Cookies

14.1. The Website uses Cookies technology in order to adapt its operation to your individual needs. According to this, you may consent to the storage of the data and information entered by you, so that it can be used for future visits to our Website without the need to re-enter it. The owners of other websites will not have access to this data and information. However, if you do not agree to personalize the Website, we suggest disabling the use of cookies in the options of your Internet browser.

14.2. Learn more on www.cronafund.com/cookie-policy.

15. Restriction of Responsibility

15.1. The Crona Fund and ECM shall not be held liable, jointly, severally or otherwise, for any claim, damage or loss that was facilitated through sophisticated technological means that surpasses the common level of security provided by companies such ours.

15.2. The Crona Fund and ECM shall not be held liable, jointly, severally or otherwise, for any claim, damage, or loss for any action or omission outside the power of control of either the Crona Fund or ECM or based on Acts of God, including environmental disasters, cut of electricity, earthquakes, pandemics, and other phenomena.

15.3. The Crona Fund and ECM shall not be held liable, jointly, severally or otherwise, for any claim, damage, or loss for any action that was initiated and/or instructed and/or executed by a user, and/or such action was in violation of any agreement, Policy, Regulation and/or circumvents such agreements, policies, regulations in bad faith, fraudulently and/or against the interests of ECM or the Crona Fund.

15.4. the Crona Fund and ECM shall not be held liable or accountable, jointly, severally or otherwise, for any illegal and/or fraudulent action with information received from an order or purchase.

15.5. To the maximum extent permitted by applicable law, the services, content and User content are provided “as is,” “with all faults” and “as available” and the entire risk of use and performance remains with you. The Crona Fund and ECM are not responsible, jointly, severally or otherwise, for the content that you upload, share or circulate in the network and any legal action that may arise from such content is completely at your own responsibility.

For more information or any questions please contact us at fundservices@eleoncapital.com .